

EXHIBIT “C”

**IN THE CIRCUIT COURT OF TENNESSEE FOR
THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

PERLENE HALEY,

Plaintiffs,

v.

DOCKET NO. CT-000853-18
DIV.: VII
(Jury Demanded)

SEARS, ROEBUCK & COMPANY;
SEARS HOME IMPROVEMENT
PRODUCTS, INC.;
SEARS HOLDINGS CORPORATION;
SEARS ROEBUCK & COMPANY, dba
KENMORE DIRECT;
NEXT STEP HOME INSPECTIONS, LLC;
ANDREW SOBRAL;
JOHN DOE; XYZ Corporation; and
ELECTROLUX HOME PRODUCTS, INC., dba
ELECTROLUX MAJOR APPLIANCES NORTH
AMERICA;

Defendants.

NOTICE OF BANKRUPTCY FILING AND IMPOSITION OF AUTOMATIC STAY

PLEASE TAKE NOTICE that on October 15, 2018, (the “**Commencement Date**”), Sears Holdings Corporation and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) each commenced a voluntary case (the “**Chapter 11 Cases**”) under chapter 11 of title 11 of the United States Code (11 U.S.C. § 101 *et seq.*) (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”). The Chapter 11 Cases are being jointly administered under Case No. 18-23538 (RDD) (the “**Bankruptcy Cases**”). A copy of the applicable [Debtor’s/Debtors’] chapter 11 petitions is attached hereto as **Exhibit A**.

PLEASE BE ADVISED that pursuant to section 362(a) of the Bankruptcy Code (the “**Automatic Stay**”), the filing of a bankruptcy petition “operates as a stay, applicable to all

entities,” of, among other things “the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under [the Bankruptcy Code], or to recover a claim against the debtor that arose before the commencement of the [bankruptcy] case” and “any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate.” 11 U.S.C. § 362(a)(1), (3). Accordingly, the above-captioned matter has been automatically stayed pursuant to section 362(a) of the Bankruptcy Code.

PLEASE BE FURTHER ADVISED that any action taken against the Debtors without obtaining, from the Bankruptcy Court, relief from the Automatic Stay is void *ab initio* and may result in a finding of contempt for violation of the Automatic Stay. The Debtors reserve and retain their statutory right to seek relief in the Bankruptcy Court from any action by Plaintiff(s) or any judgment, order, or ruling entered in violation of the Automatic Stay.

In the event the Court or any parties have questions regarding the Chapter 11 Cases, please contact counsel for the Debtors:

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Dated: October 19, 2018

Respectfully submitted,
LEITNER, WILLIAMS, DOOLEY & NAPOLITAN, PLLC

By:



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on the following attorneys of record, via Federal Express, U.S. Mail, postage prepaid, and/or via electronic mail:

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this the 19th day of October 2018.


Tracy A. Overstreet